

“Exhibit A”

Court of Common Pleas of Philadelphia County
 Trial Division
Civil Cover Sheet

PLAINTIFF'S NAME
 ROSEMARIE MERWITZ

PLAINTIFF'S ADDRESS
 42 TEAL DRIVE
 LANGHORNE PA 19047

PLAINTIFF'S NAME

PLAINTIFF'S ADDRESS

PLAINTIFF'S NAME

PLAINTIFF'S ADDRESS

TOTAL NUMBER OF PLAINTIFFS
 1

TOTAL NUMBER OF DEFENDANTS
 18

COMMENCEMENT OF ACTION
 Complaint Petition Action Notice of Appeal
 Writ of Summons Transfer From Other Jurisdictions

AMOUNT IN CONTROVERSY
 \$50,000.00 or less
 More than \$50,000.00

COURT PROGRAMS
 Arbitration
 Jury
 Non-Jury
 Other:

Mass Tort
 Savings Action
 Petition

Commerce
 Minor Court Appeal
 Statutory Appeals

Settlement
 Minors
 W/D/Survival

CASE TYPE AND CODE

2T - TOXIC TORT PERSONAL INJURY

STATUTORY BASIS FOR CAUSE OF ACTION

RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)

**FILED
PRO PROTHY**

IS CASE SUBJECT TO
COORDINATION ORDER?
 YES NO

NOV 11 2010

M. TIERNEY

TO THE PROTHONOTARY:

Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: ROSEMARIE MERWITZ

Papers may be served at the address set forth below.

NAME OF PLAINTIFF/PETITIONER'S/APPELLANT'S ATTORNEY
 THOMAS R. ANAPOL

ADDRESS
 1710 SPRUCE STREET
 PHILADELPHIA PA 19103

PHONE NUMBER FAX NUMBER
 (215) 790-4572 (215) 875-7707

E-MAIL ADDRESS
 tanapol@anapolschwartz.com

SUPREME COURT IDENTIFICATION NO.
 62121

DATE SUBMITTED
 Thursday, November 11, 2010, 12:11 pm

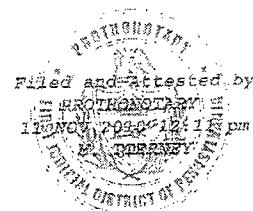
SIGNATURE OF FILING ATTORNEY OR PARTY
 THOMAS ANAPOL

FINAL COPY (Approved by the Prothonotary Clerk)

COMPLETE LIST OF DEFENDANTS:

1. DOVER CORPORATION, AS SUCCESSOR IN INTEREST TO BLACKMER PUMP
280 PARK AVENUE
NEW YORK NY 10017
2. CBS CORPORATION, F/K/A WESTINGHOUSE ELECTRIC CORPORATION
C/O CORPORATION SERVICE CO. 2704 COMMERCE DRIVE SUITE B
HARRISBURG PA 17110
3. WEIL PUMP COMPANY
W57 N14363 DOERR WAY P.O. BOX 887
CEDARBURG WI 53012
4. WATTS INDUSTRIES, AS SUCCESSOR IN INTEREST TO LESLIE CONTROL
815 CHESTNUT AVENUE
NORTH ANDOVER MA 01845
5. WARREN PUMPS, LLC
C/O CORPORATION SERVICE CO. 2711 CENTERVILLE ROAD SUITE 400
WILMINGTON DE 19808
6. SQUARE D COMPANY
LEGAL DEPARTMENT EXECUTIVE PLAZA
PALATINE IL 60067
7. ROCKBESTOS
C.T. CORPORATION C/O U.S. CORPORATION 2704 COMMERCE DRIVE, SUITE B
HARRISBURG PA 17110
8. METROPOLITAN LIFE INSURANCE COMPANY
27-01 QUEENS PLAZA NORTH
LONG ISLAND NY 11101
9. IMO INDUSTRIES, INC., AS SUCCESSOR AND F/K/A DELAVAL TURBINE
2711 CENTERVILLE ROAD SUITE 400
WILMINGTON DE 19808
10. HOWDEN BUFFALO, INC. SUCCESSOR IN INTEREST TO BUFFALO FORGE
2029 WEST DEKALB STREET
CAMDEN SC 29020
11. GTE PRODUCTS OF CONNECTICUT CORPORATION
140 WEST STREET 21ST FLOOR
NEW YORK NY 10007
12. GREENE TWEED & COMPANY, INC.
DETWEILER ROAD
KULPSVILLE PA 19443
13. THE GORMAN RUPP COMPANY, SUCCESSOR IN INTEREST TO CH WHEELER
305 SOUTH BOWMAN STREET
MANSFIELD OH 44903
14. GENERAL ELECTRIC COMPANY
C/O CT CORPORATION 100 PINE STREET SUITE 325
HARRISBURG PA 17101
15. FLOWSERVE CORP. AS SUCCESSOR IN INTEREST TO WORTHINGTON PUMP
C/O CT CORPORATION SYSTEM 116 PINE STREET SUITE 320
HARRISBURG PA 17101
16. EATON CORP., AS SUCCESSOR IN INTEREST TO VICKERS, INC.
1111 SUPERIOR AVENUE
CLEVELAND OH 44117
17. BUFFALO PUMPS
874 OLIVER STREET
NORTH TONAWANDA NY 14120
18. ALLIS CHALMERS CORPORATION
C/O CT CORPORATION SYSTEM 116 PINE STREET SUITE 320
HARRISBURG PA 17101

ANAPOL, SCHWARTZ, WEISS, COHAN, FELDMAN & SMALLY
BY: LAWRENCE R. COHAN, ESQUIRE
THOMAS R. ANAPOL, ESQUIRE
L.D. NOS.: 30546; 62121;
1710 Spruce Street
Philadelphia, PA 19103
(215) 735-1130



Rosemarie Merwitz, Administratrix of the Estate of Edward Merwitz, Deceased, and Rosemarie Merwitz, in her own right
42 Teal Drive
Langhorne, PA 19047 : COURT OF COMMON PLEAS
vs. : PHILADELPHIA, PA
ALLIS CHALMERS CORPORATION, et al : ASBESTOS CASE
: November TERM, 2010
: JURY TRIAL DEMANDED

NOTICE

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Philadelphia Bar Association and Lawyer Referral Service
1101 Market Street, 11th floor
Philadelphia, PA 19107-2911
(215) 238-6333

DEFENDANT'S ADDRESSES

ALLIS-CHALMERS CORPORATION
c/o C.T. Corporation System
116 Pine Street, Suite 320
Harrisburg, PA 17101

BUFFALO PUMPS
874 Oliver Street
North Tonawanda, NY 14120

CBS CORPORATION
f/k/a Westinghouse Electric Corporation
c/o Corporation Service Company
2704 Commerce Drive, Suite B
Harrisburg, PA 17110

DOVER CORPORATION
280 Park Avenue
New York, NY 10017

EATON CORPORATION
Eaton Center
1111 Superior Avenue
Cleveland, OH 44117

FLOWSERVE CORPORATION
c/o C.T. Corporation System
116 Pine Street, Suite 320
Harrisburg, PA 17101

GENERAL ELECTRIC COMPANY
c/o C.T. Corporation
100 Pine Street, Suite 325
Harrisburg, PA 17101

THE GORMAN RUPP COMPANY
305 South Bowman Street
Mansfield, OH 44903

GREENE TWEED & COMPANY, INC.
Detweiler Road
Kulpsville, PA 19443

GTE PRODUCTS OF CONNECTICUT CORPORATION
As successor in interest to Clark Control
140 West Street, 21st Floor
New York, NY 10007

HOWDEN BUFFALO, INC.
2029 West Dekalb Street
Camden, SC 29020

IMO INDUSTRIES, INC.
2711 Centerville Road
Suite 400
Wilmington, DE 19808

METROPOLITAN LIFE INSURANCE COMPANY
27-01 Queens Plaza North
Long Island, New York 11101

ROCKBESTOS
C.T. Corporation
c/o U.S. Corporation
2704 Commerce Drive, Suite B
Harrisburg, PA 17110

SQUARE D COMPANY
Legal Department
Executive Plaza
Palatine, Illinois 60067

WARREN PUMPS, LLC
c/o Corporation Service Company
2711 Centerville Road, Suite 400
Wilmington, DE 19808

WATTS INDUSTRIES, INC.
815 Chestnut Avenue
North Andover, MA 01845

WEIL PUMP COMPANY
W57 N14363 Doerr Way
P.O. Box 887
Cedarburg, WI 53012

ANAPOL, SCHWARTZ, WEISS, COHAN, FELDMAN & SMALLEY
 BY: LAWRENCE R. COHAN, ESQUIRE
 THOMAS R. ANAPOL, ESQUIRE
 I.D. NOS.: 30546: 62121
 1710 Spruce Street
 Philadelphia, PA 19103
 (215) 735-1130

Rosemarie Merwitz, Administratrix of the Estate of Edward Merwitz, Deceased, and Rosemarie Merwitz, in her own right	:	COURT OF COMMON PLEAS PHILADELPHIA, PA
42 Teal Drive	:	ASBESTOS CASE
Langhorne, PA 19047	:	<i>November</i> TERM, 2010
 vs. 		
ALLIS CHALMERS CORPORATION	:	
BUFFALO PUMPS	:	
CBS CORPORATION, a Delaware corporation	:	
f/k/a Westinghouse Electric Corporation	:	
402 DOVER CORPORATION, as successor	:	
in interest to Blackmer Pump Company	:	
434 EATON CORPORATION, as successor	:	
in interest to Vickers, Inc.	:	
FLOWSERVE CORPORATION, as	:	
Successor in interest to Worthington Pumps	:	
THE GORMAN RUPP COMPANY,	:	
As successor in interest to C.H. Wheeler	:	
064 GENERAL ELECTRIC COMPANY	:	
132 GREENE TWEED & COMPANY, INC.	:	
GTE PRODUCTS OF CONNECTICUT, as	:	
Successor in interest to Clark Control	:	
HOWDEN BUFFALO, INC. as successor	:	
in interest to Buffalo Forge Company	:	
IMO INDUSTRIES, INC., as successor in	:	
interest to and f/k/a DeLaval Turbine,	:	
Transamerica DeLaval and Imo DeLaval;	:	
METROPOLITAN LIFE INSURANCE CO.	:	
425 ROCKBESTOS, f/k/a Rock Bestos Company	:	
SQUARE D COMPANY	:	
WARREN PUMPS, LLC	:	
WATTS INDUSTRIES, as successor in interest	:	
to Leslie Control Valves	:	
WEIL PUMP COMPANY	:	

COMPLAINT - CIVIL ACTION (2. Personal Injury)
26035/2090 Asbestos

Pursuant to an Order dated July 30, 1986, signed by the Honorable Richard B. Klein and the Honorable Edward J. Blake, the following short form Complaint is utilized in this asbestos action.

1. The Plaintiffs in the instant matter are:

- a. Rosemarie Merwitz, Administratrix
(Plaintiff-Spouse)
42 Teal Drive
Langhorne, Pennsylvania 19047
- b. Edward Merwitz, Deceased (Plaintiff-Decedent-Worker)
Social Security No. 204-36-0789
Date of Birth: October 15, 1947
Date of Death: July 31, 2010

2. The Defendants in the instant matter are those listed in the above caption.

3. The Defendants in the instant matter are those listed in the above captioned. In addition, Plaintiff has named Defendant, METROPOLITAN LIFE INSURANCE COMPANY, which was not named in Plaintiff's Master General Long Form Complaint, No. 89-90000-11-2.

Defendant, METROPOLITAN LIFE INSURANCE COMPANY, is an insurance company organized and existing under the laws of the State of New York, has its principal place of business in the State of New York and at all times material hereto was doing business in the Commonwealth of Pennsylvania. It is sued for its conduct and omissions as a consultant to certain defendants.

4. Plaintiff-decedent's asbestos exposure history, including to the extent possible at this time, the asbestos manufacturers and products to which Plaintiff-decedent was exposed; and the inclusive dates of exposure and job site(s) is attached hereto as Exhibit I.

5. Plaintiff-decedent's estate first learned of Decedent's asbestos-related disease, Mesothelioma, on or about January 13, 2010 from Dr. Mark Igoe. Plaintiff-decedent's estate first became aware of his asbestos-related disease only after the diagnosis date.

6. Plaintiff-worker's history of tobacco use is as follows:

Plaintiff-decedent was a lifetime non-smoker.

7. A claim for lost wages is asserted at this time.

8. Pursuant to an Order dated July 30, 1986 signed by the Honorable Richard B. Klein and the Honorable Edward J. Blake allowing for the filing of a "Short Form Complaint" and a "Master Long Form Complaint," Plaintiffs have filed the instant Complaint. Plaintiff(s) hereby incorporate(s) the "Master Long Form Complaint" as if that document was set forth at length herein including, but not limited to:

Count I	-	Negligence and Outrageous Conduct
Count II	-	Strict Liability
Count III	-	Conspiracy
Count IV	-	Breach of Warranty
Count VI	-	Loss of Consortium
Count IX	-	Metlife
Count XI	-	Wrongful Death
Count XII	-	Damages

ANAPOL, SCHWARTZ, WEISS, COHAN
FELDMAN & SMALLY

BY

LAWRENCE R. COHAN, ESQUIRE

VERIFICATION

I, Rosemarie Merwitz, Administratrix of the Estate of Edward Merwitz, deceased, hereby state that I am the Plaintiff and verify that the statements made in the foregoing COMPLAINT, are true and correct to the best of my knowledge, information and belief. The undersigned understands that the statement therein is made subject to the penalties of 18 Pa.C.S.A. 4904, relating to unsworn falsification to authorities.

X Rosemarie Merwitz
Rosemarie Merwitz, Administratrix
of the Estate of Edward Merwitz, Deceased

DATED: 11/10/12

EDWARD MERWITZ
EXHIBIT I
(PLAINTIFF-DECEDENT'S WORK HISTORY)

Commencement Date	Cessation Date	Employer Location	Social Security Number	Job Description	Asbestos Manufacturers Products
1965	1971	<p>Philadelphia Naval Ship Yard</p> <p>Ships Worked on:</p> <p>USS Saratoga USS Shangri-la USS New Orleans USS Chilton</p>	210-34-3002	Apprentice Ship Fitter	See detailed description in Plaintiff's Master Long Form Complaint